



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

CMM:LS  
F. #2024R00485

*271 Cadman Plaza East  
Brooklyn, New York 11201*

March 24, 2025

By ECF and E-mail

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Re: United States v. Jacob Israel Walden  
Criminal Docket No. 24-521 (GRB)

Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, enclosed please find the government's production of additional discovery in the above-captioned case. The discovery has been transmitted by USAfx, a file-sharing system. Please promptly download the materials and confirm in writing to the government that you were able to do so. The government also requests reciprocal discovery from the defendant.

Please note that, as before, some of the enclosed material is considered Sensitive Discovery Material ("SDM") as that term is defined in the January 24, 2025 Protective Order in this matter. See ECF No. 40. As such, PDF files containing SDM have been marked as "Sensitive" on each page, and non-PDF files have been marked as "Sensitive" in the filename. In addition, certain documents have been redacted to remove the personally identifiable information of known or suspected minor victims.

I. The Government's Discovery

A. Documents and Tangible Objects

Please find enclosed the following additional materials:

***Subpoena Returns***

- Subpoena returns from Apple, which are Bates-numbered DOJ\_0000479 to DOJ\_0000489.
- Subpoena returns from Cash App, which are Bates-numbered DOJ\_0000490 to DOJ\_0000587.
- Subpoena returns from Paypal/Venmo, which are Bates-numbered DOJ\_0000588 to DOJ\_0000669.
- Subpoena returns from Snapchat, which are Bates-numbered DOJ\_0000670 to DOJ\_0000748.
- Subpoena returns from Yahoo, which are Bates-numbered DOJ\_0000763.

***Search Warrant Returns***

- Search warrant returns from Snapchat, which are Bates-numbered DOJ\_0000749 to DOJ\_0000762. These records are not produced in their entirety due to the Child Sexual Abuse Material ("CSAM") contained therein. As discussed, the complete, unredacted search warrant returns may be reviewed at the Newark office of Homeland Security Investigations ("HSI") by contacting me or HSI Special Agent Christopher Moriarty.

II. Request for the Defendant's iPhone

This is to memorialize that on March 12, 2025, you requested a copy of the defendant's Apple iPhone, excepting any CSAM. On March 21, 2025, the government advised that it is prepared to produce the requested information. However, as noted, because there is no reliable manner in which to separate CSAM from non-CSAM multimedia files, and to avoid producing CSAM inadvertently, the government will produce an extraction of the iPhone without any multimedia files. To facilitate the requested production, please provide an external hard drive of at least 2 terabytes in storage size.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

JOHN J. DURHAM  
United States Attorney

By: /s/ Leonid Sandlar  
Leonid Sandlar  
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Enclosures (via USAfx link)

cc: Clerk of the Court (GRB) (by ECF) (without enclosures)